

From: Ehrhart, Richard
To: ["COLEMAN, Vanessa \(Frisco, TX\)"](#)
Cc: bill.shafford@tceq.texas.gov; [Frank Clark \(fclark@wh-m.com\)](mailto:fclark@wh-m.com); [Grant Sherwood](#); [Spalding, Susan](#); [Smith, Melissa](#); [Miller, Gary](#)
Subject: RE: Landfill RAWP Pilot Test
Date: Monday, March 25, 2013 11:21:00 AM

Vanessa,

EPA appreciates that Exide Technologies Inc. has agreed to collect additional waste characterization samples (per our discussion) during the first and second Landfill Remediation Pilot Test periods to help establish the adequacy of the mixing/treatment process. We anticipate having several EPA staff present during the beginning of the Pilot to observe the process.

thanks

Rick

Rick Ehrhart
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From: COLEMAN, Vanessa (Frisco, TX) [mailto:Vanessa.Coleman@na.exide.com]
Sent: Friday, March 22, 2013 2:22 PM
To: Ehrhart, Richard
Cc: bill.shafford@tceq.texas.gov; [Frank Clark \(fclark@wh-m.com\)](mailto:fclark@wh-m.com); [Grant Sherwood](#)
Subject: Landfill RAWP Pilot Test

Rick-

Per the discussion during our call yesterday, March 21, 2013, Exide Technologies Inc. has agreed to modify the sampling protocol to be used during the Pilot Test period for the Landfill Remediation project.

The current Waste Stabilization Plan (WSP) contained within the Response Action Work Plan (RAWP), both dated January 31, 2013 (updated March 1, 2013), states in Section 3.3.4 that each ~20 cy container of re-treated slag will be sampled to verify that it satisfies the UTS prior to replacement into the landfill. In response to EPA concerns regarding the uniformity and consistency of the mixing process during re-treatment, Exide has agreed to take 4 representative samples from each treatment batch (~20 cy) for 10 batches during the Pilot Test period. The original plan contemplated a single confirmatory sample per batch. Each of the 4 samples will be analyzed for TCLP lead and cadmium.

A similar approach will be used during the Pilot Test proposed for the onset of milling activities of the deeper slag which is harder and more cemented. This second Pilot Study is mentioned in the final Perimeter Air monitoring Plan (AMP).

Please confirm that this addresses your concerns regarding the re-treatment process.

Also, due to several stop works this week, our anticipated start on landfill remediation activities is next Tuesday or Wednesday, March 26 or 27th. We will send an updated Monday afternoon to confirm the start date and time.

Thank you -
Vanessa Coleman
Site Manager

Exide Technologies

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